



6. The production of records, the answers to Interrogatories, and the Deposition of Khloud Hegazin, are necessary to properly prosecute Plaintiff's claims.

7. Responses to Plaintiffs' requests are overdue.

8. The Court has set a discovery cutoff of July 7, 2008.

**WHEREFORE**, Plaintiffs pray that this Court enter and Order:

1. Ordering that the Request to Produce and Interrogatories be fully complied with by June 15, 2008.
2. Compelling the deposition of Khloud Hegazin, to proceed by June 15, 2008, at Plaintiffs' counsel's offices at 19 W. Jackson Blvd., Suite 300, Chicago, Illinois.
3. That as set forth in FRCP 37(d) that Defendant pay reasonable litigation expenses including attorneys' fees of this motion.

TRUSTEES OF THE SUBURBAN TEAMSTERS  
OF NORTHERN ILLINOIS PENSION AND  
WELFARE FUNDS

By: \_\_\_\_\_  
One of Its Attorneys

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